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Attorney for Defendant Christine deNoyo

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION

JAMES BURT, an individual,	)	
	)	Case No. 6:14-cv-01098-AA
Plaintiff,	)	
	)	DEFENDANT'S ANSWER AND
v.	)	AFFIRMATIVE DEFENSES TO
	)	PLAINTIFF'S FIRST AMENDED
CHRISTINE DENOYO, an individual,	)	CIVIL COMPLAINT
	)	
Defendant,	)	
	)	
and	)	
	)	
KEY TRADING LLC, a Delaware limited	)	
liability company; RAFAEL DENOYO, an	)	
individual; DAVID SULLIVAN, an	)	
individual; PETER LARKIN, an individual,	)	
	)	
Judgment Defendants.	)	

Defendant Christine Jordan, formerly known as Christine deNoyo ("Defendant"), by and through her attorney, Kevin W. Bons of Beckley & Bons, P.C., submits the following Answer to Plaintiff's First Amended Civil Complaint, and admits, denies, and alleges as follows:

DEFENDANT'S ANSWER AND AFFIRMATIVE DEFENSES  
TO PLAINTIFF'S FIRST AMENDED CIVIL COMPLAINT- Page 1

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Christine\Pleadings\Defendant's Answer to  
First Amended Civil Complaint (19 NOV  
15).wpd

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1.

To the extent that the Introduction in Plaintiff's First Amended Complaint contains allegations against Defendant, those allegations are denied.

2.

Defendant has insufficient knowledge or information to admit or deny the allegations contained in paragraphs 1, 3 through 31, 33, 34, 44, 48, 54 through 62, 67, 74, 75, 81 through 84, 86, 98, and 118, and therefore denies the same.

3.

Defendant specifically denies the allegations contained in paragraphs 32, 35 through 37, 39 through 42, 47, 49 through 53, 63 through 66, 68 through 73, 76 through 80, 85, 87 through 97, 99 through 117, 119, and 120.

4.

Defendant admits paragraph 2 of the Complaint, except that Defendant denies any allegation or inference that Defendant has ever engaged in any activity that would require a securities license.

5.

Defendant has insufficient knowledge or information to admit or deny the allegations contained in paragraph 38 of the Complaint, except that Defendant denies any allegation or inference that Defendant purposefully concealed any bank account or other financial account Defendant held with her spouse.

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DEFENDANT'S ANSWER AND AFFIRMATIVE DEFENSES  
TO PLAINTIFF'S FIRST AMENDED CIVIL COMPLAINT- Page 2

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6.

Defendant specifically denies the allegations contained in paragraph 43, except that Defendant admits she maintains a bank account with Wells Fargo Bank, N.A., ending in 9351.

7.

Defendant specifically denies the allegations contained in paragraph 45, except that Defendant admits that her declaration of July 31, 2014 stated that she has never been an owner, employee, or representative of KEY TRADING, Centurion Securities LLC, or any other business of Rafael deNoyo.

8.

Defendant admits paragraph 46 of the Complaint.

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DEFENDANT'S ANSWER AND AFFIRMATIVE DEFENSES  
TO PLAINTIFF'S FIRST AMENDED CIVIL COMPLAINT- Page 3

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DEFENDANT'S FIRST AFFIRMATIVE DEFENSE

(Failure to State a Claim)

8.

Defendant contends that Plaintiff has failed to state a claim for relief as against Defendant, in that Plaintiff fails to allege sufficient facts to support any of its claims against Defendant.

9.

Defendant reserves the right to amend this Answer after further information is obtained through discovery and allege additional affirmative defenses and/or counterclaims.

WHEREFORE, Defendant prays for judgment in her favor and against Plaintiff as follows:

1. Dismissing Plaintiff's First Amended Civil Complaint with prejudice;
2. Awarding Defendant her reasonable attorney fees, costs, and disbursements incurred herein; and
3. Such other and further relief as the Court deems just and reasonable.

DATED this 19th day of November, 2015.

BECKLEY & BONs, P.C.

/s/ Kevin W. Bons

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DEFENDANT'S ANSWER AND AFFIRMATIVE DEFENSES  
TO PLAINTIFF'S FIRST AMENDED CIVIL COMPLAINT- Page 4

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### **CERTIFICATE OF SERVICE**

I, KEVIN W. BONS, hereby certify that I am the attorney for Defendant Christine deNoyo, and that I caused to be served the foregoing DEFENDANT'S ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF'S FIRST AMENDED CIVIL COMPLAINT on the 19th day of November, 2015 on the attorneys for Plaintiff listed below by the electronic filing of this DEFENDANT'S ANSWER AND AFFIRMATIVE DEFENSES TO PLAINTIFF'S FIRST AMENDED CIVIL COMPLAINT.

Franklin Jason Siebert  
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BECKLEY & BONS, P.C.

By: /s/ Kevin W. Bons  
Kevin W. Bons, OSB # 066963  
Attorney for Defendant Christine deNoyo

### **CERTIFICATE OF SERVICE**

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